

**From:** Jones, Christopher M  
**To:** ["David Sims"](#)  
**Cc:** [Saad, Lindsey M.](#)  
**Subject:** RE: Harris v. Q&A, et al  
**Date:** Friday, December 23, 2016 9:19:00 AM

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Thanks, David. Please ensure that all billing records are included in the production.

Chris

## Christopher M. Jones, Esq.

Attorney

### Flaherty

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**From:** David Sims [mailto:[david.sims@mywvlawyer.com](mailto:david.sims@mywvlawyer.com)]  
**Sent:** Friday, December 23, 2016 9:10 AM  
**To:** Jones, Christopher M  
**Cc:** Saad, Lindsey M.  
**Subject:** Re: Harris v. Q&A, et al

Good morning Chris. I am preparing the records to be sent to you. I want you to understand that even though Dr. Pelts saw Evan for nearly 9 years, there are not a lot of records. There are 88 pages, including administrative stuff. I am emailing them to you. You don't need to make any arrangements to receive them unless you cannot print them from your email.

I was busy the last two days getting documents ready for a settlement hearing that took place yesterday with another member of your firm, Jeff Wakefield. Then I got on a plane yesterday morning, late, and flew to St. Augustine, FL, which is where I am now. I haven't been ignoring you on purpose.

I will send you the records, via email, very soon.

David

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**From:** "Jones, Christopher M" <[CJones@flahertylegal.com](mailto:CJones@flahertylegal.com)>  
**Date:** Friday, December 23, 2016 at 8:51 AM  
**To:** "David A. Sims" <[david.sims@mywvlawyer.com](mailto:david.sims@mywvlawyer.com)>  
**Cc:** Lindsey Saad <[LSaad@flahertylegal.com](mailto:LSaad@flahertylegal.com)>  
**Subject:** RE: Harris v. Q&A, et al

David,

Allow this email to follow-up on the correspondence below and my telephone call to your office yesterday afternoon regarding production of Dr. Pelts today. As I indicated below, please let me know if and how you intend to produce the file today pursuant to the Court's Order so that my office can make proper arrangements to receive the file. If you do not intend to produce the file, I would greatly appreciate notification of the same.

Thanks and happy holidays,  
Chris

**Christopher M. Jones, Esq.**

Attorney

**Flaherty**

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**From:** Jones, Christopher M  
**Sent:** Wednesday, December 21, 2016 4:59 PM  
**To:** 'David Sims'  
**Cc:** Saad, Lindsey M.  
**Subject:** Harris v. Q&A, et al

David,

Pursuant to the Court's Order, please provide copies of Dr. Pelts's entire file for Evan M. Harris, including all medical and administrative records, releases and agreements on or before Friday, December 23, 2016. Prior to delivery on Friday, please let us know how you intend to produce the records so that we can make proper arrangements to receive the same.

Additionally, I have attached a draft protective order for your review. Please note that the Court's Order does not condition production of the aforementioned records upon entry of a protective order. Therefore, regardless of whether we can agree on a proposed protective order, we expect that the aforementioned records will be produced on Friday, December 23, 2016.

Thanks,  
Chris

**Christopher M. Jones, Esq.**

Attorney

**Flaherty**

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